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ROBERT J. CIPRIANI

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT J. CIPRIANI, an individual,

Plaintiff,

v.

RESORTS WORLD LAS VEGAS, LLC, a
Delaware limited liability company, RESORTS
WORLD LAS VEGAS HOTELS, LLC, a
Delaware limited liability company, SCOTT
SIBELLA an individual, and DOES 1-10,

Defendants.

Case No. 2:23-cv-01626-MMD-MDC

**DECLARATION OF VIKRAM SOHAL RE
DEFENDANTS' OPPOSITIONS TO
PLAINTIFF'S MOTION FOR LEAVE OF
THE COURT TO FILE A FIRST
AMENDED COMPLAINT**

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I, VIKRAM SOHAL, declare:

1. I am an attorney duly licensed to practice law in the State of California. I am admitted *pro hac vice* to appear before this Court. I am employed by Nemecek & Cole, APC, the counsel of record for Plaintiff Robert J. Cipriani. I have personal knowledge of the matters stated herein and I could and would competently testify thereto.

2. I submit this declaration in order to address an issue raised in Defendants' oppositions to Plaintiff's motion for leave to file an amended complaint. Specifically, in those oppositions, Defendants' counsel imply that I was not being truthful to the Court when I stated in the moving papers that I found out about Mr. Sibella pleading guilty to money laundering charges after the February 23, 2024, hearing on Defendants' motion to stay discovery. They suggest that because Plaintiff was posting about the guilty plea on his social media well before the February 23 date, that I must have known about it too.

3. I hereby again represent to the Court that I found out about Mr. Sibella's guilty plea after the February 23, 2024, hearing on defendants' motion to stay discovery. Of course, I could have found out about it earlier had I, for example, performed Internet searches, etc. However, due to the fact that I was in a trial most of January and February of this year, I did not focus on many matters other than the trial itself during that time period. Indeed, had I known about Mr. Sibella's guilty plea, I would have raised that issue during the February 23 hearing on defendants' motion to stay discovery as Mr. Sibella is now facing up to 5 years in prison.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 20th day of March 2024 at Garden Grove, California.

/s/Vikram Sohal
Vikram Sohal